

Before the
Federal Communication Commission
Federal Communications Commission
Washington, D.C. 20554

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JUL 19 1992

FCC MAIL ROOM

IN THE MATTER OF:

Replacement of Par 90)
by Part 88 to Revise) PR Docket 92-235
the Private Land Mobile)
Radio Services and Modify)
the Policies Governing them)

TO: The Commission

COMMENT ON

The Regional Fire Protection Authority (hereinafter referred to as R.F.P.A.) opposes the FCC PR Docket 92-235. The R.F.P.A. submits its comments in response to the Commission's Notice of Proposed Rule Making in these proceedings.

The R.F.P.A. is an organization established in 1980 pursuant to the provision of Title 1, Division 7, Chapter 5, Article 1, of the Government Code of the State of California (commencing with section 6500) for the purpose of operating those fire protection and related functions, which may be included to reduce individual agency financial and personnel requirements.

The R.F.P.A. operates a cooperative program for fire protection and public safety related functions as described below:

1. Communications
2. Fire Prevention
3. Fleet Maintenance
4. Master Planning
5. Property Management
6. Training
7. Resource Utilization

The R.F.P.A. serves an area of 1,100 square miles with a population base of 260,000. Our Communications Center dispatched 22,504 emergency incidents and approximately 5,000 calls were referred to other agencies in 1992.

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IN THE MATTER OF: PR Docker 92-235
Submitted by: Regional Fire Protection Authority

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1. The R.F.P.A. supports the LMCC Consensus Plan Version 'A.' Given the current State's economy, the plan allows for a more gradual and reasonable change out (25/12/5 KHz) and that the phased transition to 12.5 KHz can be accomplished through the normal funding process, thus decreasing the financial burden.
2. The notice of proposed rule making 92-235 will degrade the R.F.P.A.'s ability to provide effective radio communications due to anticipated problems with:
 - A. Increased interference; and,
 - B. Reduced coverage area relating to the new restrictions on power and height.
3. We suggest a more lenient time frame of conversion and the year 2000 for implementation.

Respectfully submitted,

Regional Fire Protection Authority

A handwritten signature in dark ink, appearing to read 'Gary Long', is written over the printed name and title.

Gary Long, Fire Chief
Chairman

CT:JT:kc